In The United States Patent and Trademark Office
On Appeal From The Examiner To The Board
of Patent Appeals and Interferences

In re Application of:	Roger V. Beathard et al.
Serial No.:	09/579,331
Filing Date:	May 25, 2000
Group Art Unit:	2642
Examiner:	Thjuan P. Knowlin
Title:	System and Method for Routing Call Across Call Managers Using a Route Plan

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Appeal Brief

Appellants have appealed to the Board of Patent Appeals and Interferences from the decision of the Examiner finally rejecting Claims 1-4, 6-16, 18-46, and 48-51, as evidenced in the Final Office Action mailed August 11, 2005. Appellants filed a Notice of Appeal on November 8, 2005. Appellants respectfully submit this Appeal Brief with the statutory fee of $500.00.

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Real Party In Interest

This application is currently owned by Cisco Technology, Inc., as indicated by an assignment recorded on August 24, 2000, in the Assignment Records of the United States Patent and Trademark Office at Reel 011032, Frames 0329-0332.

Related Appeals and Interferences

There are no known appeals or interferences which will directly affect or be directly affected by or have a bearing on the Board's decision regarding this appeal.

Status of Claims

Claims 1-4, 6-16, 18-46, and 48-51 are pending in this application and all stand rejected under a final Office Action mailed August 11, 2005. Appellants present Claims 1-4, 6-16, 18-46, and 48-51 for appeal. Appendix A shows all pending claims.

Status of Amendments

The Examiner has entered all amendments that were submitted before the final Office Action mailed August 11, 2005. No further amendments have been submitted.

Summary of Claimed Subject Matter

IP networks and other packet-based networks transmit data (including voice and video data) by placing the data in packets and sending each packet individually to the selected destination. (Page 9, lines 1-4). The technology that allows telecommunications to be transmitted over an IP network (as well as other packet-based networks) may be referred to as Voice over Packet (VoP). IP telephony devices have the capability of encapsulating a user's voice (or other media inputs) into IP packets so that the voice can be transmitted over local area networks, wide area networks, and/or the Internet. IP telephony devices may include telephones, fax machines, computers running telephony software, gateway devices, H.323-compatible devices, or any other device capable of performing telephony functions in an IP network. (Page 9, lines 11-21).

Referring to Figure 1 of the Application, a communication network 10 is shown that includes a plurality of call managers 26 that control one or more IP telephony devices 22. A call manager 26 is an application that controls call processing, routing, telephone features and options (such as call hold, call transfer and caller ID), device configuration, and other telephony functions and parameters within communication network 10. A call manager 26 can control one or more of the IP telephony devices 22 coupled to the same LAN 20 to which it is coupled, and a call manager 26 may also control IP telephony devices 22 located elsewhere in communications network 10. (Page 9, lines 22-32).

The ability of a call manager 26 to control any IP telephony device 22 in communication network 10 allows a call processing environment in which control of devices may distributed dynamically in response to changes in communication network 10. For example, if a call manager 26 goes off-line, the telephony devices 22 controlled by that call manager 26 can connect and register with an alternative call manager 26 in communication network 10. Likewise, if a communication link between a telephony device 22 and a call manager 26 goes down, the telephony device 22 may connect and register with an alternative call manager 26 to which there is an operable communication path. (Page 10, line 27 – Page 11, line 7).

Still referring to Figure 1, when a telephony device 22 or gateway device 24 (which couples external telephony devices to a packet-based network) wishes to establish communications with another device in communication network 10, the device 22 or 24 typically communicates one or more digits to the call manager 26 controlling the device 22 or

24. The digits identify the device with which communication is requested. For example, a telephony device 22 may send a call manager 26 one or more digits indicating the telephone number of an IP telephony device 22 or a non-IP telephony device (such as a PBX device 54 or a PSTN device 68) to initiate a telephone call with the device. Alternatively, a gateway device 24 may communicate one or more digits to a call manager 26 identifying an IP telephony device 22 with which a non-IP telephony device 54, 68 desires to communicate. (Page 13, lines 7-20).

Referring now to Figure 2 of the Application, in particular embodiments, digit inputs received by a call manager 26 are communicated to a digit analysis module 104. Digit analysis module 104 may receive these digits directly from a device process 108 associated with a device 22 or 24, a call control module 102 (which received the digits from a device process 108) or any other suitable process in the same or a different call manager 26. Digit analysis module 104 may translate the digit input it receives into a process ID (PID) associated with a device process 108 that is associated with the device 22 or 24 designated by the received digits. (Page 13, lines 21-29). Alternatively, as described below, the digit input may be translated into the PID of a route list control process that is associated with a gateway device 24. (Page 31, line 32 – Page 32, line 5). Digit analysis module 104 performs this translation using a table look-up in a registration information table 110 or any other suitable process of determining the PID associated with the digits. Digit analysis module 104 communicates the PID to the process that requested the digit analysis. (Page 13, line 21 – Page 14, line 11).

Referring to Figures 6A and 6B of the Application, in particular embodiments, when a telephone number is associated in registration information table 110 with a route list control process (providing access to one or more gateway devices 24), the route list control process has an associated route list 122 that contains an ordered list of one or more route groups 124. For example, route list 122a includes route groups 124a, 124c, and 124b, in the order listed. A route group 124 includes an ordered list of one or more device name/port number pairs 126 associated with one or more gateway devices 24. For example, route group 124a includes Port1, Port2 and Port3 of Gateway1, and Port1, Port2 and Port3 of Gateway2. The ports of a gateway device 24 are the individually addressable physical, logical or virtual resources, such as trunk lines or logical channels, over which a call may be placed to a non-IP telephony

device 54, 68. An individual port may be capable of handling multiple calls. (Page 31, line 30 – Page 32, line 18).

When a telephone number is dialed that is associated with a route list control process in registration information table 110, the call request is sent to the route list control process. The route list control process offers the call to the ports of the gateway devices 24 listed in the first route group 124 of the route list 122 associated with the route list control process, for example, route group 124a of route list 122a. The call is offered to these ports in the order in which the associated port numbers are listed in the route group 124a. The route list control process communicates the call request to each gateway device 24 (indicating the requested port) until one of the gateway devices 24 accepts the call. If no port listed in route group 124a can accept the call, the route list control process begins offering the call to the ports listed in route group 124c, and then to the ports listed in route group 124b. (Page 32, line 19 – Page 33, line 4).

Particular embodiments of the present invention enable calls to be routed to gateway devices based on a route plan. The route plan directs that calls be routed to specific gateway devices 24 based on the destination of the call. The present invention allows a call placed from a telephony device controlled by one call manager 26 to be routed using the route plan to a gateway device 24 controlled by a different call manager 26. The route plan may be implemented by creating the route lists described above, which each contain one or more route groups. These route lists and route groups may be globally used by all call managers 26 in a particular packet-based network regardless of the relative locations of a call manager 26 and a gateway device 24 in a route group. The route lists and route groups may be dynamically updated to reflect changes in the overall route plan or to reflect a change in the call manager that controls a particular gateway device. (Page 4, lines 5-23).

Ground of Rejection to be Reviewed on Appeal

Appellants request that the Board review the Examiner's rejection of Claims 1-4, 6-16, 18-46, and 48-51, under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,389,130 issued to Shenoda et al. ("*Shenoda*") in view of U.S. Patent No. 6,144,727 issued to Mashinsky ("*Mashinsky*").

Argument

The Examiner's rejection of Claims 1-4, 6-16, 18-46, and 48-51 is improper, and the Board should withdraw the rejection for the reasons given below.

The Examiner's Rejection of Claims 1-4, 6-16, 18-46, and 48-51 is Improper

The Examiner rejected Claims 1-4, 6-16, 18-46, and 48-51, under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,389,130 issued to Shenoda et al. ("*Shenoda*") in view of U.S. Patent No. 6,144,727 issued to Mashinsky ("*Mashinsky*"). For the reasons discussed below, each of these claims are allowable over the proposed combination of references.

Independent Claims 1, 13, 33, and 44 are Allowable over *Shenoda* and *Mashinsky*

Claim 1 of the Application recites the following:

> A method for call routing, comprising:
> receiving a call request at a first call manager from a first telephony device coupled to a packet-based network, the call request including a telephone number associated with a second telephony device;
> accessing a route list associated with the telephone number to determine a port of a gateway device operable to transmit the call request to the second telephony device, wherein the route list comprises one or more route groups, each route group including a list of one or more ports of one or more gateway devices; and
> communicating the call request to a second call manager controlling the gateway device included in the route list.

Independent Claims 13, 33, and 44 recite similar, although not identical, limitations.

The Examiner asserts that *Mashinsky* discloses a "route list [that] comprises one or more route groups, each route group including a list of one or more ports of one or more gateway devices." The Examiner has cited to different passages of the reference in each of the last two Office Actions and in the Advisory Action for a teaching of this limitation. In total, it appears that the Examiner has cited to Figure 1A; Figure 13; Column 7, lines 11-21; Column 9, lines 30-48; Column 13, lines 14-22; Column 21, lines 20-42 and 50-65; Columns 22-23, lines 56-16; and Columns 25-26, lines 66-5 of *Mashinsky* to support the rejection with respect to this limitation. Furthermore, in the Response to Arguments section of the Final

Office Action, the Examiner specifies that the disclosed route groups are "e.g. original network route or global network route." Appellants respectfully submit that none of these passages include any disclosure that is related to route lists, much less a route list that comprises *one or more route groups, each route group including a list of one or more ports of one or more gateway devices*, as recited in Claim 1 (and similarly, although not identically, in Claims 13, 33, and 44).

The cited portions of *Mashinsky* simply indicate that the originating gateway switch determines whether the called location is accessible via the global network. There is no disclosure that the originating gateway (or any other device) accesses any type of route list, much less a route list that includes even one route group, which in turn includes even one port of a gateway device. The Examiner seems to be indicating that the "original network route" and "global network route" are route groups as claimed. These are not route groups as claimed, they are merely routes through the network. They are not included in a route list and they do not include one or more ports of gateway devices (they are physical routes – how can they be included in a list or include a list of ports?). The claims do not recite a choice between two routes. They clearly require that a route *list* that be accessed. The Examiner has not shown how any of the cited references disclose accessing such a route list. For at least this reason, Appellants respectfully request allowance of Claims 1, 13, 33, and 44.

Moreover, the Final Office Action also rejects Claims 12, 34, and 38 using the same arguments as those for Claims 1, 13, 33, and 44 (at least they are rejected in the same paragraph of the Office Action). However, Claims 12 and 38 depend from Claims 10 and 37, respectively, which are rejected based on arguments in other paragraphs of the Office Action. Appellants assume for the purposes of this Appeal Brief that these claim rejections should go along with their respective parent claims (Appellants requested clarification of this issue from the Examiner on multiple occasions, but received no response). Furthermore, Claim 34 recites limitations that are similar to those of Claims 3, 15, and 45. Thus, Appellants assume for the purposes of this Appeal Brief that this claim is rejected for the same reason as these related claims (which are addressed in Paragraph 6 of the Office Action). Again, Appellants requested clarification of this issue from the Examiner on multiple occasions, but received no response. These claims are addressed together below.

The Dependent Claims are Also Allowable over *Shenoda* and *Mashinsky*

Dependent Claims 2-4, 6-12, 14-16, 18-32, 34-43, 45-56, and 48-51 depend from, and incorporate all of the limitations of independent Claims 1, 13, 33, or 44, which are allowable for the reasons discussed above. Therefore, dependent Claims 2-4, 6-12, 14-16, 18-32, 34-43, 45-56, and 48-51 are allowable as they depend from allowable base claims. In addition to their dependence on allowable base claims, at least dependent Claims 3-4, 11, 15-16, 18, 23-24, 26, 34-35, 37, 45-46, and 48 are also allowable because they each contain additional limitations not disclosed in *Shenoda* or *Mashinsky*, as described below.

Claims 3, 15, 34, and 45 are Allowable over *Shenoda* and *Mashinsky*

The Examiner asserts that *Mashinsky* discloses the limitation of Claim 3 that recites "accessing a registration information table to determine a process identification (PID) of a route list control process." Claims 15, 34, and 45 recite similar, although not identical, limitations. The Examiner cites to "originating toll switch 14" and Columns 20-21, lines 61-19 of *Mashinsky* to support the rejection with respect to this limitation. However, Appellants respectfully submit that this passage does not include any disclosure that is related to a registration information table, a PID, or a route list control process. It is unclear to Appellants how and why the Examiner is using *Mashinsky* to disclose this limitation and the Examiner has not properly addressed these claims. For at least this additional reason, Appellants respectfully request allowance of Claims 3, 15, 34, and 45.

Claims 4, 16, 35, and 46 are Allowable over *Shenoda* and *Mashinsky*

Claim 4 recites, in part, accessing a route list to obtain the device name and a port number of the gateway device. Claims 16, 35, and 46 recite similar, although not identical, limitations. In the Response to Arguments section of the Final Office Action, the Examiner asserts that *Mashinsky* discloses this limitation in that it teaches obtaining a gateway address and a port number of a gateway device. However, the gateway address is not a device name. Furthermore, there is no disclosure that any of this information is obtained from a route list (which, as described above, includes one or more route groups). *Mashinsky* only discloses

receiving "instructions from node 44." This is not a disclosure of the limitations recited in Claims 4, 16, 35, and 46. For at least this additional reason, Appellants respectfully request allowance of Claims 4, 16, 35, and 46.

Claims 6, 11, 18, 37, and 48 are Allowable over *Shenoda* and *Mashinsky*

Claim 6 recites, in part, accessing a device name mapping table using the device manager to determine a PID of a first device process executed by the second call manager and controlling the gateway device. Claims 11, 18, 37, and 48 recite similar, although not identical, limitations.[1] The Examiner asserts that *Mashinsky* discloses the above limitation at Column 7, lines 11-21, Columns 7-8, line 38-4, Column 21, lines 50-65, Column 22, lines 56-66, and Columns 25-26, lines 66-5. Furthermore, the Examiner appears to assert that *Mashinsky* discloses the device name mapping table as a topology map or template. However, these passages simply are not related to this limitation and the topology map or template is not a device name mapping table as claimed. *Mashinsky* fails to disclose any device mapping table, let alone accessing the device mapping table to determine a process identification of a first device process executed by a second call manager, as recited in Claim 6, and similarly, although not identically, in Claims 11, 18, 37, and 48. For at least this additional reason, Appellants respectfully request allowance of Claims 6, 11,18, 37, and 48.

Claim 23 is Allowable over *Shenoda* and *Mashinsky*

Claim 23 recites, in part, a device manager operable to receive a signal indicating that a new gateway device has registered with the call manager. The Examiner rejects Claim 23 in the same paragraph in which Claims 6, 11, 18, 37, and 48 are rejected. However, the Examiner does not mention any portion of *Mashinsky* that the Examiner asserts as containing a disclosure of a device manager operable to receive a signal indicating that a new gateway device has registered with the call manager. The cited passages do not relate to this

[1] The Final Office Action rejects Claim 11 in Paragraph 6. However, as Appellants previously pointed out to the Examiner, Claim 11 contains similar limitations to Claims 6, 18, 37, and 48, which are rejected in Paragraph 8. Therefore, Appellants assume for the purposes of this Appeal Brief that Claim 11 is rejected under the same reasoning as Claims 6, 18, 37, and 48, but request clarification from the Examiner since this rejection remains unchanged.

limitation. For at least this additional reason, Appellants respectfully request allowance of Claim 23.

Claim 24 is Allowable over *Shenoda* and *Mashinsky*

Claim 24 of the present invention recites:

> The call manager of Claim 18, wherein the device manager is further operable to:
>
> receive a signal indicating that a gateway device is no longer under the control of the call manager;
>
> delete the device name and associated PID of the gateway device from the device name mapping table; and
>
> communicate a deletion signal to the second call manager coupled to the packet-based network indicating that the device name and associated PID should be deleted from a device name mapping table of the second call manager.

The Examiner rejects Claim 24 in the same paragraph in which Claims 6, 11, 18, 37, and 48 are rejected. However, the Examiner does not mention any portion of *Mashinsky* that the Examiner asserts as containing a disclosure of the above limitations. The cited passages do not relate to the limitations quoted above. For at least these additional reasons, Claim Appellants respectfully request allowance of Claim 24.

Claim 25 is Allowable over *Shenoda* and *Mashinsky*

Claim 25 recites, in part, a device manager operable to receive a signal indicating that a third call manager has come on-line in the packet-based network. In the Response to Arguments section of the Final Office Action, the Examiner states that *Mashinsky* teaches this limitation at Column 21, lines 20-42 and Columns 22-23, lines 60-16. In particular, the Examiner refers to the disclosure of SS7 signaling information. However, there is nothing in these passages that teaches any sort of signaling indicating a call manager has come on-line, and the Examiner has not explained how SS7 signaling discloses this limitation. For at least this additional reason, Appellants respectfully request allowance of Claim 25.

Claim 26 is Allowable over *Shenoda* and *Mashinsky*

Claim 26 recites a device manager operable to receive a signal indicating that the second call manager has gone off-line and delete the device name and associated PID of the gateway devices controlled by the second call manager. In the Response to Arguments section of the Final Office Action, the Examiner states that *Mashinsky* teaches these limitations at Columns 21-22, lines 58-18. Appellants fail to see how this passage relates at all to the recited limitations. For at least this additional reason, Appellants respectfully request allowance of Claim 26.

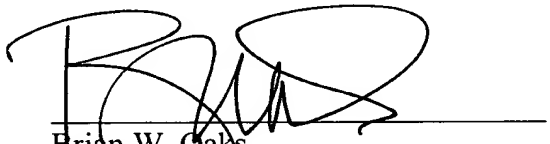
Conclusion

Appellants have demonstrated that the present invention, as claimed, is clearly distinguishable over the prior art cited by the Examiner. Therefore, Appellants respectfully request the Board of Patent Appeals and Interferences to reverse the final rejection of the Examiner and instruct the Examiner to issue a notice of allowance of all claims.

Appellants have enclosed a check in the amount of $500.00 for this Appeal Brief. Appellants believe no additional fees are due. The Commissioner is hereby authorized to charge any fee and credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.
Attorneys for Appellants



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Appendix A: Claims on Appeal

1. (Previously Presented) A method for call routing, comprising:

receiving a call request at a first call manager from a first telephony device coupled to a packet-based network, the call request including a telephone number associated with a second telephony device;

accessing a route list associated with the telephone number to determine a port of a gateway device operable to transmit the call request to the second telephony device, wherein the route list comprises one or more route groups, each route group including a list of one or more ports of one or more gateway devices; and

communicating the call request to a second call manager controlling the gateway device included in the route list.

2. (Original) The method of Claim 1, wherein:

the packet-based network comprises an Internet Protocol (IP) network;

the first telephony device comprises an IP telephony device; and

the second telephony device comprises a non-IP telephony device.

3. (Original) The method of Claim 1, further comprising:

accessing a registration information table to determine a process identification (PID) of a route list control process executed by the first call manager and associated with the telephone number; and

communicating the call request to the route list control process using the PID, the route list control process operable to access the route list.

4. (Original) The method of Claim 1, wherein accessing a route list associated with the telephone number comprises accessing a route list to obtain the device name and a port number of the gateway device.

5. (Cancelled)

6. (Original) The method of Claim 4, further comprising:

communicating the device name of the gateway device to a device manager executed by the first call manager; and

accessing a device name mapping table using the device manager to determine a PID of a first device process executed by the second call manager and controlling the gateway device.

7. (Original) The method of Claim 6, wherein communicating the call request to a second call manager controlling the gateway device comprises communicating the call request and the port number to the first device process.

8. (Original) The method of Claim 7, further comprising:

communicating the call request and the port number from the first device process to the gateway device;

receiving a call proceed signal from the gateway device indicating acceptance of the call request; and

communicating the call proceed signal from the second call manager to the first call manager.

9. (Original) The method of Claim 8, further comprising establishing media streaming between the first telephony device and the gateway device in response to receiving the call proceed signal from the second call manager.

10. (Original) The method of Claim 7, further comprising:

communicating the call request and the port number from the first device process to the gateway device;

receiving a call denial signal from the gateway device indicating a denial of the call request; and

communicating the call denial signal from the second call manager to the first call manager.

11. (Original) The method of Claim 10, further comprising:

accessing the route list to obtain the device name and a port number of a second gateway device;

communicating the device name of the second gateway device to the device manager executed by the first call manager;

accessing a device name mapping table using the device manager to determine a PID of a second device process executed by the second call manager and controlling the second gateway device; and

communicating the call request and the port number to the second device process.

12. (Original) The method of Claim 10, further comprising:

accessing the route list to obtain a second port number of the gateway device; and

communicating the call request and the second port number to the first device process.

13. (Previously Presented) A call manager coupled to a packet-based network and operable to control a plurality of telephony devices, comprising:

a first device process controlling a first telephony device and operable to receive a call request from the first telephony device, the call request including a telephone number associated with a second telephony device;

a call control module operable to receive the call request from the first device process; and

a route list control process associated with the telephone number and operable to:

receive the call request from the call control module;

access an associated route list to determine a port of a gateway device operable to transmit the call request to the second telephony device, wherein the route list comprises one or more route groups, each route group including a list of one or more ports of one or more gateway devices; and

communicate the call request to a second call manager coupled to the packet-based network and controlling the gateway device included in the route list.

14. (Original) The call manager of Claim 13, wherein:

the packet-based network comprises an Internet Protocol (IP) network;

the first telephony device comprises an IP telephony device; and

the second telephony device comprises a non-IP telephony device.

15. (Original) The call manager of Claim 13, further comprising:

a digit analysis module operable to receive from the call control module the telephone number included in the call request, the digit analysis module further operable to access a registration information table to determine a process identification (PID) of the route list control process associated with the telephone number and to communicate the PID to the call control module; and

wherein the call control module communicates the call request to the route list control process using the PID.

16. (Original) The call manager of Claim 13, wherein the route list control process is operable to access the route list to obtain a device name and a port number of the gateway device.

17. (Cancelled)

18. (Original) The call manager of Claim 16, further comprising a device manager operable to:

receive the device name of the gateway device from the route list control process;

access a device name mapping table to determine a PID of a second device process executed by the second call manager and controlling the gateway device; and

communicate the PID of the second device process to the route list control process.

19. (Original) The call manager of Claim 18, wherein the route list control process is operable to communicate the call request and the port number to the second device process using the PID.

20. (Original) The call manager of Claim 19, wherein:

the route list control process is further operable to receive a call proceed signal from the second device process and to communicate the call proceed signal to the call control module; and

the call control module is operable to establish media streaming between the first telephony device and the gateway device in response to receiving the call proceed signal.

21. (Original) The call manager of Claim 19, wherein the route list control process is operable to:

receive a call denial signal from the second device process;

access the route list to obtain the device name and a port number of a second gateway device;

communicate the device name of the second gateway device to the device manager;

receive from the device manager a PID of a third device process executed by the second call manager and controlling the second gateway device; and

communicate the call request and the port number to the third device process.

22. (Original) The method of Claim 19, wherein the route list control process is operable to:

receive a call denial signal from the second device process;

access the route list to obtain a second port number of the gateway device; and

communicate the call request and the second port number to the second device process.

23. (Original) The call manager of Claim 18, wherein the device manager is further operable to:

receive a signal indicating that a new gateway device has registered with the call manager, the signal including the device name of the gateway device and the PID of the device process controlling the gateway device;

store the device name and associated PID in the device name mapping table; and

communicate the device name and associated PID to the second call manager coupled to the packet-based network.

24. (Original) The call manager of Claim 18, wherein the device manager is further operable to:

receive a signal indicating that a gateway device is no longer under the control of the call manager;

delete the device name and associated PID of the gateway device from the device name mapping table; and

communicate a deletion signal to the second call manager coupled to the packet-based network indicating that the device name and associated PID should be deleted from a device name mapping table of the second call manager.

25. (Previously Presented) The call manager of Claim 18, wherein the device manager is further operable to:

receive a signal indicating that a third call manager has come on-line in the packet-based network; and

communicate the device name and associated PID of each gateway device controlled by the call manager in which device manager is executing to the third call manager.

26. (Previously Presented) The call manager of Claim 18, wherein the device manager is further operable to:

receive a signal indicating that the second call manager has gone off-line; and

delete the device name and associated PID of the gateway devices controlled by the second call manager.

27. (Original) The call manager of Claim 13, further comprising:

a local route plan database accessible by the route list control process; and

a route plan manager operable to download one or more route lists from a global route plan database coupled to the packet-based network and further operable to store the route lists in the local route plan database for access by the route list control process.

28. (Original) The call manager of Claim 27, further comprising a plurality of route list control processes, each route list control process associated with a route list stored in the local route plan database.

29. (Original) The call manager of Claim 28, wherein the route plan manager is further operable to:

receive a route plan change notification indicating a modification of a route list in the global route plan database;

delete the route list from the local route plan database;

download the modified route list from the global route plan database; and

store the modified route list in the local route plan database.

30. (Original) The call manager of Claim 29, wherein the route plan manager is further operable to instruct the route list control process associated with the modified route plan to unregister with the call control module after the route plan change notification is received and further operable to instruct the route list control process to re-register with the call control module after the modified route list is stored in the local route plan database.

31. (Original) The call manager of Claim 28, wherein the route plan manager is further operable to:

receive a route plan change notification indicating the creation of a new route list in the global route plan database;

download the new route list from the global route plan database;

store the new route list in the local route plan database;

create a route list control process associated with the new route list; and

instruct the route list control process associated with the new route list to register with the call control module.

32. (Original) The call manager of Claim 28, wherein the route plan manager is further operable to:

receive a route plan change notification indicating the deletion of a route list in the global route plan database;

delete the route list from the local route plan database; and

instruct the route list control process associated with the deleted route list to unregister with the call control module.

33. (Previously Presented) Call manager software embodied in a computer-readable medium and operable to perform the following steps:

receive a call request from a first telephony device coupled to a packet-based network, the call request including a telephone number associated with a second telephony device;

access a route list associated with the telephone number to determine a port of a gateway device operable to transmit the call request to the second telephony device, wherein the route list comprises one or more route groups, each route group including a list of one or more ports of one or more gateway devices; and

communicate the call request to a second call manager software controlling the gateway device included in the route list.

34. (Original) The call manager software of Claim 33, further operable to:

access a registration information table to determine a process identification (PID) of a route list control process executed by the first call manager software and associated with the telephone number; and

communicate the call request to the route list control process using the PID, the route list control process operable to access the route list.

35. (Previously Presented) The call manager software of Claim 33, further operable to access the route list to obtain the device name and a port number of the gateway device.

36. (Previously Presented) The call manager software of Claim 35, further operable to access one or more of the route groups included in the route list to obtain the device name and port number of the gateway device.

37. (Original) The call manager software of Claim 35, further operable to:

communicate the device name of the gateway device to a device manager executed by the first call manager software; and

access a device name mapping table using the device manager to determine a PID of a first device process executed by the second call manager software and controlling the gateway device.

38. (Original) The call manager software of Claim 37, wherein communicating the call request to second call manager software controlling the gateway device comprises communicating the call request and the port number to the first device process.

39. (Original) The call manager software of Claim 38, further operable to receive a call proceed signal from the first device process.

40. (Original) The call manager software of Claim 39, further operable to establish media streaming between the first telephony device and the gateway device in response to receiving the call proceed signal from the first device process.

41. (Original) The call manager software of Claim 38, further operable to receive a call denial signal from the first device process.

42. (Original) The call manager software of Claim 41, further operable to:

access the route list to obtain the device name and a port number of a second gateway device;

communicate the device name of the second gateway device to the device manager executed by the first call manager software;

access a device name mapping table using the device manager to determine a PID of a second device process executed by the second call manager software and controlling the second gateway device; and

communicate the call request and the port number to the second device process.

43. (Original) The call manager software of Claim 41, further operable to:

access the route list to obtain a second port number of the gateway device; and

communicate the call request and the second port number to the first device process.

44. (Previously Presented) A call manager coupled to a packet-based network and operable to control a plurality of telephony devices, comprising:

means for receiving a call request from a first telephony device controlled by the call manager, the call request including a telephone number associated with a second telephony device;

means for accessing a route list to determine a port of a gateway device operable to transmit the call request to the second telephony device, wherein the route list comprises one or more route groups, each route group including a list of one or more ports of one or more gateway devices; and

means for communicating the call request to a second call manager coupled to the packet-based network and controlling the gateway device included in the route list.

45. (Original) The call manager of Claim 44, further comprising:

means for accessing a registration information table to determine a process identification (PID) of the means for accessing the route list; and

means for communicating the call request to the means for accessing the route list using the PID.

46. (Original) The call manager of Claim 44, wherein the means for accessing the route list is operable to obtain a device name and a port number of the gateway device from the route list.

47. (Cancelled)

48. (Original) The call manager of Claim 46, further comprising:

means for receiving the device name of the gateway device;

means for accessing a device name mapping table to determine a PID of a second device process executed by the second call manager and controlling the gateway device; and

means for communicating the call request and the port number to the second device process using the PID.

49. (Original) The call manager of Claim 48, further comprising:

means for receiving a call proceed signal from the second device process; and

means for establishing media streaming between the first telephony device and the gateway device in response to receiving the call proceed signal.

50. (Original) The call manager of Claim 48, further comprising:

means for receiving a call denial signal from the second device process;

means for accessing the route list to obtain the device name and a port number of a second gateway device;

means for obtaining a PID of a third device process executed by the second call manager and controlling the second gateway device; and

means for communicating the call request and the port number to the third device process.

51. (Original) The call manager of Claim 48, further comprising:

means for receiving a call denial signal from the second device process;

means for accessing the route list to obtain a second port number of the gateway device; and

means for communicating the call request and the second port number to the second device process.

Appendix B: Evidence

NONE

Appendix C: Related Proceedings

NONE